

April 28, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90
Ayrshire Farmers Mutual Telephone Company and Northwest Telephone
Cooperative Association
Challenge to Competitive Coverage**

Dear Ms. Dortch:

On behalf of Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association ("Ayrshire" and "Northwest"), Reynolds Schultheis Consulting, Inc. ("RSCONCO") files the attached documents comments to challenge the competitive coverage of a number of competitors in census blocks served by Ayrshire and Northwest. The challenges are predicated on different conditions as identified in the attachments listed below.

- Attachment 1 – Summary of competitors and census blocks
- Attachment 2 – Letters of competitors lacking voice capability
- Attachment 3 – Subsidized competitors
- Attachment 4 – Non-voice capable subsidiary
- Attachment 5 – Non-certificated competitive carriers

Ayrshire and Northwest respectfully request that the census blocks eliminated from support as identified in Attachment 1 be reclassified as support eligible. This filing is made pursuant to the streamlined challenge process established by the Public Notice.¹

Sincerely,


Jeffrey W. Reynolds, Principal
19116 Summershade Drive
Little Rock, AR 72223
jreynolds@rsconco.com
Work: 501 830-3175

cc: Katie King, Telecommunications Access Policy Division, (via e-mail)

¹ See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process in Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) ("Public Notice")

Attachment 1

Summary of Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association in Support of the A-CAM Competitive Challenge Process

- **Ayrshire Farmers Mutual Telephone Company Challenge Summary**
- **Northwest Telephone Cooperative Association Challenge Summary**

Ayrshire Farmers Mutual Telephone Company

River Valley Telephone Coop

191479604002239 – River Valley doesn't provide service in this block-Letter received from River Valley

Premier Communications

190410801001076 – Jointly located in this block - Letter received from Premier Communications

190410801001081 – Jointly located in this block - Letter received from Premier Communications

190410801001082 – Jointly located in this block - Letter received from Premier Communications

190410801001091 – Jointly located in this block - Letter received from Premier Communications

191479604002276 - Jointly located in this block - Letter received from Premier Communications

Northwest Communications

19041080102127 – Removed from NWComm 477 report–4-26-2016-- Letter received from Northwest Communications

191479602002143 - Jointly located in this block- Letter received from Northwest Communications

191479602002144 - Jointly located in this block - Letter received from Northwest Communications

191479602002151 - Jointly located in this block - Letter received from Northwest Communications

191479602002166 - Jointly located in this block - Letter received from Northwest Communications

191479602002167 - Removed from NWComm 477 report – 4-26-2016 - Letter received from Northwest Communications

191479602002177 - Jointly located in this block - Letter received from Northwest Communications

191479602002181 - Jointly located in this block - Letter received from Northwest Communications

191479604002158 - Jointly located in this block - Letter received from Northwest Communications

191479604002169 - Removed from NWComm 477 report – 4-26-2016 - Letter received from Northwest Communications

Evertex

190410801001073 - Jointly located in this block- Letter received from Evertex

190410801001086 - Jointly located in this block - Letter received from Evertex

190410801002054 – Jointly located in this block- Letter received from Evertek

190410801002098 - Jointly located in this block- Letter received from Evertek

190410801002115 - Jointly located in this block- Letter received from Evertek

190410801002120 – No Voice - Letter received from Evertek

191479604002220 – No Voice - Letter received from Evertek

191479604002259 – No Voice - Letter received from Evertek

191479604002269 - Jointly located in this block- Letter received from Evertek



river valley telephone coop

191479602002222 – Not located in RV telephone exchange - Letter received from River Valley

191517802001118 – Not located in RV telephone exchange - Letter received from River Valley

Evertex

190919702003018 – Joint block with Century Link - Letter received from Evertex

191479601002290 – Joint block with IA Telecom - Letter received from Evertex

191479604002269 – Joint block with AFMTC - Letter received from Evertex

191517801003085 – Joint block with IA Telecom - Letter received from Evertex

191517801003096 – In town Plover – no voice service - Letter received from Evertex

191517802001027 – Joint block with IA Telecom - Letter received from Evertex

191517802001047 – no voice service - Letter received from Evertex

191517802001115 – no voice service - Letter received from Evertex

LTD Broadband

191099506001090 - Joint block with Century Link – No voice certificate for Iowa

191099506001111 - Joint block with Century Link – No voice certificate for Iowa

191099506001177 - Joint block with Century Link – No voice certificate for Iowa

191099506001179 - Joint block with Century Link – No voice certificate for Iowa

191099506001218 - Joint block with Century Link – No voice certificate for Iowa

191479601002124 - Joint block with Century Link – No voice certificate for Iowa

191479601002125 - Joint block with Century Link – No voice certificate for Iowa

Northwest Communications

191099506001067 – Joint block with Century Link – No customers

191479601002327 – Removed from NW Comm 477 – 4-27-16

191479602002341 – Joint block with IA Telecom or Qwest

191517801003135 - Removed from NW Comm 477 – 4-27-16

NWT-Fixed Broadband deployment

191479602002220 – this is Northwest Telephone, is reported on NWT/351261 477

Prairieinet

190919702003019	191099506001230	191479601002135
191099506001073	191099506001232	191479601002136
191099506001079	191099506001233	191479601002176
191099506001082	191099506001243	191479601002258
191099506001083	191099506001244	191479601002265
191099506001094	191099506001245	191479601002267
191099506001095	191099506001247	191479601002269
191099506001096	191099506001250	191479601002270
191099506001097	191099506001252	191479601002322
191099506001098	191099506001253	191479601002323
191099506001099	191099506001255	191479601002324
191099506001100	191099506001256	191479601002325
191099506001101	191099506001257	191479601002328
191099506001102	191099506001263	191479601002329
191099506001103	191099506001264	191479601002330
191099506001104	191099506001266	191479601002331
191099506001105	191099506001267	191479601002332
191099506001106	191099506001270	191479601002333
191099506001107	191099506001271	191479601002335
191099506001108	191099506001276	191479601003000
191099506001109	191099506001283	191479601003003
191099506001222	191099506001287	191479601003081
191099506001226	191099506001288	191517802003001
191099506001227	191099506001311	191517802003002
191099506001228	191479601002133	

Attachment 2

Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association

Lack of Voice Capability

- Evertex Letter to Ayrshire Farmers Mutual Telephone Company
- Evertex Letter to Northwest Telephone Cooperative Association



216 North Main
Everly, Iowa 51338

April 27, 2016

Mr. Donald Miller
CEO
Ayrshire Farmers Mutual Telephone Company
1405 Silver Lake Avenue
Ayshire, IA 50515

RE: Ayrshire Farmers Mutual Telephone Comapny Census Blocks

Dear Mr. Miller:

Evertek, Inc. does not provide voice service to any locations within the state of Iowa. Our FRN # is 0011496445.

The following Census blocks we do not offer voice services:

190410801001073, 190410801001086, 190410801002054, 190410801002098, 190410801002115,
190410801002120, 191479604002220, 191479604002259, 191479604002269

If you have any questions, please contact me on 712-834-2255.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Roxanne White'.

Roxanne White
CEO



216 North Main
Everly, Iowa 51338

April 27, 2016

Mr. Donald Miller
CEO
Northwest Telephone Cooperative Association
844 Wood Street
Havelock, IA 50546

RE: Northwest Telephone Cooperative Association Census Blocks

Dear Mr. Miller:

Evertek, Inc. does not provide voice service to any locations within the state of Iowa. Our FRN # is 0011496445.

The following Census blocks we do not offer voice services:

190919702003018, 191479601002290, 191479604002269, 191517801003085, 191517801003096,
191517802001027, 191517802001047, 191517802001115

If you have any questions, please contact me on 712-834-2255.

Respectfully submitted,

Roxanne White
CEO

Attachment 3

Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association

Subsidized ILEC

- River Valley Letter to Ayrshire Farmers Mutual Telephone Company
- River Valley Letter to Northwest Telephone Cooperative Association
- Premier Communications Letter



339 1st Avenue NE - Sioux Center, IA 51250
PHONE: 712-722-3451 - FAX: 712-722-1113 - WWW.MYPREMIERONLINE.COM

April 26, 2016

Don Miller
Ayrshire Communications
PO Box 248
1405 Silver Lake Ave.
Ayrshire, Iowa 50515

Dear Don,

I am writing to confirm that we are a subsidized Incumbent Local Exchange Carrier that receives Universal Service Support and serves customers in Clay and Palo Alto counties that are adjacent to your exchange boundaries. Our service areas meet in the same census blocks along those borders of exchanges, but do not overlap service areas.

The Webb-Dickens Telephone Corporation d/b/a Premier Communications detail is listed under:

FRN 0002586998

Study area codes include:

351327

This information is in support of the challenge process for Ayrshire Communications and Webb-Dickens Telephone Corporation d/b/a Premier Communications to remove each other as competitors in the census blocks as listed in the USAC and FCC competitive census blocks.

Thank you in advance.

Sincerely,

Ryan Boone, Regulatory Manager

Webb-Dickens Telephone Corporation d/b/a Premier Communications

April 27th, 2016



Don Miller
Ayrshire Mutual Telephone Company
PO Box 248
1405 Silver Lake Ave.
Ayrshire, Iowa 50515

Dear Don,

I am writing to confirm that we are a subsidized incumbent Local Exchange Carrier that receives Universal Service Support and Serves Customers in Clay and Palo Alto Counties that are adjacent to you exchange boundaries. Our service areas meet in the same census blocks along those borders of exchanges, but do not overlap services areas.

River Valley Telecommunications Coop detail is listed under:

FRN 0003730959

Study area code include:

351189

Census Block - 191479604002239 will be corrected on our 477.

This information is in support of the challenge process for Ayrshire Farmers Mutual Telephone Company to remove each other as competitors in the census block as listed in the USAC and FCC census blocks.

Thanks you in advance.

Sincerely,

Ivan Dalen
General Manager



April 27th, 2016

Don Miller
Northwest Telephone Cooperative Association
844 Wood Street
Havelock, IA, 50546

Dear Don,

I am writing to confirm that we are a subsidized incumbent Local Exchange Carrier that receives Universal Service Support and Serves Customers in Clay and Palo Alto Counties. Our service areas meet in the same census blocks along those borders of exchanges, but do not overlap services areas.

River Valley Telecommunications Coop detail is listed under:

FRN 0003730959

Study area code include:

351189

Census Block – 191479602002222 and 191517802001118 will be correct on our 477.

This information is in support of the challenge process for Northwest Telephone Cooperative Association to remove each other as competitors in the census block as listed in the USAC and FCC census blocks.

Thanks you in advance.

Sincerely,

Ivan Dalen
General Manager

Attachment 4

Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association

Non-Voice Capable Subsidiary

- Northwest Communications Letters to FCC



844 Wood Street, Havelock, IA 50546

PHONE: 800.249.5251

WEBSITE: www.ncn.net

April 27, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Room TW-A325
Washington, DC 20554

RE: WC Docket no. 10-90
In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support


Dear Ms. Dortch:

Northwest Communications, Inc a subsidiary of Northwest Telephone Cooperative Associations a subsidized company is filing this letter in WC Docket No. 10-90 to inform the Commission that Northwest Communications, Inc's terrestrial wireless services do not provide voice service to any terrestrial wireless locations within the state of Iowa and does not offer any broadband services in the study area of Northwest Telephone Cooperative Association. Northwest Communication's, Inc provides fixed terrestrial wireless broadband (no voice) service to Windstream and Century Link customers.

Northwest Communications (FRN) 0003722410.

If you have any questions, please contact me on 712-776-2222.

Respectfully submitted,


Donald D. Miller
CEO

Copies to:
Katie King, Wireline Competition Bureau



844 Wood Street, Havelock, IA 50546

PHONE: 800.249.5251

WEBSITE: www.ncn.net

April 27, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Room TW-A325
Washington, DC 20554

RE: WC Docket no. 10-90

In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support

Dear Ms. Dortch:

Northwest Communications, Inc is a 100% owner of Ayrshire Farmers Mutual Telephone Company. Northwest Communications, Inc is a subsidiary of Northwest Telephone Cooperative Associations a subsidized company is filing this letter in WC Docket No. 10-90 to inform the Commission that Northwest Communications, Inc's terrestrial wireless services do not provide voice service to any terrestrial wireless locations within the state of Iowa and does not offer any broadband services in the study area of Ayrshire Farmers Mutual Telephone Company. Northwest Communication's, Inc provides fixed terrestrial wireless broadband (no voice) service to Windstream and Century Link customers.

Northwest Communications (FRN) 0003722410

If you have any questions, please contact me on 712-776-2222.

Respectfully submitted,

Donald D. Miller
CEO

Copies to:

Katie King, Wireline Competition Bureau

Attachment 5

Ayrshire Farmers Mutual Telephone Company and Northwest Telephone Cooperative Association

Non-Certificated Carriers - Iowa

- Iowa Utilities Board e-mail re: LTD Broadband
- Iowa Utilities Board e-mail re: Prairie iNet

Chase Cox

From: Don Miller
Sent: Tuesday, April 26, 2016 11:38 AM
To: Chase Cox; Michelle Beekman; Andy Wiita
Subject: FW: LTD Broadband

From: Rosauer, Dennis [IUB] [mailto:Dennis.Rosauer@iub.iowa.gov]
Sent: Tuesday, April 26, 2016 11:37 AM
To: Don Miller <miller@ncn.net>
Subject: LTD Broadband

Don,

In a similar manner as the previous email concerning Prairie iNet, I researched whether LTD Broadband was certificated in Iowa. They are **not** certificated to provide local exchange service. Again, this was the first time I heard of this company. Per its website, *LTD Broadband opened for business in 2011 with one tower Rose Creek, MN. Now LTD Broadband has over 100 towers in southern Minnesota and northern Iowa.*

More detailed information was found at this location: <http://broadbandnow.com/LTD-Broadband> A list of potentially affected communities was included on this site.

The Board certifies a company to provide service in exchanges. The list of communities does not comport with this requirement. There is leeway given to those who provide their own service territory maps but there has not been anything filed by LTD Broadband.

LTD Broadband has not filed a carrier registration form with the Board.

Again, if you have any questions, please feel free to contact me.



Iowa Utilities Board

Dennis Rosauer
Utility Analyst
1375 E. Court Avenue
Des Moines, Iowa 50319-0069
Dennis.Rosauer@iub.iowa.gov
(515) 725-7345

From: Rosauer, Dennis [IUB] [mailto:Dennis.Rosauer@iub.iowa.gov]
Sent: Tuesday, April 26, 2016 11:37 AM
To: Don Miller <miller@ncn.net>
Subject: Prairie iNet, Skybeam, and JAB

Don,

Here is the info I gathered on JAB Wireless and the related companies. JAB Wireless is the parent company of Skybeam, Rhino, Digis, Prairie iNet, and many, many more fixed wireless broadband companies. One article stated JAB purchased @ 800 smaller companies. All services from any of these companies were rebranded as Rise Broadband in 2015. (See attached news release that was found on Rise Broadband's website.)

Beginning with Skybeam. They are certificated to provide local exchange service in Iowa. More detailed information may be found on the Board's EFS system by searching under Docket No. TCU-2015-0002. The exchanges where Skybeam was initially authorized are shown on Attachment A to the certificate that was issued on June 8, 2015. The West Bend exchange was **not** one of these exchanges. The link to the docket

is: <https://efs.iowa.gov/efs/SearchDocumentSearch.do?searchType=document&sortColumn=xDateFiled&sortBy=Desc&numOfResults=25&docketNumber=TCU-2015-0002>

My research shows that Skybeam has not expanded this initial service area.

Skybeam applied for and was granted monies by the FCC in the rural broadband experiment project. That meant Skybeam needed to become an ETC, and per Iowa's rules, had to obtain a certificate.

Prairie iNet is **not** a certificated local exchange company in Iowa. My discussions with you were the first times I ever heard the company name. It has not ever filed to become certificated. Therefore, if Prairie iNet is providing service in the West bend exchange, it is not under a state-issued certificate.

My research, primarily through the internet, could not determine the service area for Prairie iNet.

In addition to certification, the Board's EFS system can show the carrier registration forms of any local exchange carrier, AOS company, long distance company etc. These forms are in compliance with Board rule 22.23(3) or carrier registration. While Skybeam has one on file with the Board, there is none for Prairie iNet.

If you have further questions, please let me know.



Iowa Utilities Board

Dennis Rosauer
Utility Analyst
1375 E. Court Avenue
Des Moines, Iowa 50319-0069
Dennis.Rosauer@iub.iowa.gov
(515) 725-7345